

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	)	Chapter 11
	)	
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-11068 (JTD)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Hearing Date: April 12, 2023, at 1:00 p.m. (ET)
	)	Objection Deadline: March 29, 2023, at 4:00 p.m. (ET)

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**NOTICE OF MOTION OF SAMUEL BANKMAN-FRIED FOR RELIEF FROM  
THE AUTOMATIC STAY, TO THE EXTENT APPLICABLE, TO PERMIT  
INSURERS TO ADVANCE AND/OR REIMBURSE DEFENSE COSTS  
AND FEES UNDER DIRECTORS AND OFFICERS INSURANCE POLICIES**

**PLEASE TAKE NOTICE** that, on March 15, 2023, Samuel Bankman-Fried (the “Movant”) filed the *Motion of Samuel Bankman-Fried for Relief from the Automatic Stay, to the Extent Applicable, to Permit Insurers to Advance and/or Reimburse Defense Costs and Fees Under Directors and Officers Insurance Policies* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE THAT** responses or objections, if any, to the Motion must be filed on or before **March 29, 2023 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, Clerk’s Office, 824 North Market Street, Third Floor, Wilmington, Delaware 19801 and served upon, so as to actually be received by, the undersigned counsel to Movant on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT** a hearing on the Motion, if required, will be held on **April 12, 2023, at 1:00 p.m. (ET)** (the “Hearing Date”) before the Honorable John T. Dorsey, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801. Only responses and objections in writing and timely filed, served and received in accordance with this Notice will be considered by the Bankruptcy Court at this hearing.

**PLEASE TAKE FURTHER NOTICE THAT, IF NO RESPONSES OR OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN**

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 15, 2023  
Wilmington, Delaware

Respectfully submitted,

**MONTGOMERY McCracken Walker &  
Rhoads LLP**

/s/ Gregory T. Donilon

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-and-

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